

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:12-CV-169

MARY'S HOUSE, INC., *et al.*,
Plaintiffs,

v.

STATE OF NORTH CAROLINA, *et al.*,
Defendants.

SETTLEMENT TERMS

Plaintiffs and Defendants agree to settle the captioned litigation on the following terms:

1. In order to avoid the costs attendant with litigation, the Parties have agreed to settle the captioned litigation on the terms stated in this document. The parties agree they will incorporate these terms in a formal settlement agreement within a reasonable time following the date of this document. The parties agree they will sign the formal settlement agreement on or before June 15, 2014.

2. Defendants shall pay Plaintiffs ^{Mary's House, Inc. only,} seventy-two thousand five hundred dollars and zero cents (\$72,500.00) (the "Settlement Amount"). The Settlement Amount shall be made in a lump sum payment delivered no later than August 1, 2014. The payment shall be made by check payable to Brooks, Pierce, McLendon, Humphrey & Leonard.

3. The Department agrees that, pursuant to its obligations under N.C.G.S. § 150B-19.1(b) to review and repeal rules that are unnecessary, unduly burdensome, or

assigns, upon execution by the undersigned, who represent and warrant that they are authorized to enter into this agreement on behalf of the Parties hereto.

7. This Agreement shall not be deemed or construed to be an admission of fault by Defendants with respect to any of the claims.

8. This Agreement shall be binding upon the Parties and is entered into knowingly, intelligently, and voluntarily.

9. Half of the mediator fee will be billed to the Department and the other half of the mediator fee will be waived.

FOR DEFENDANTS

By: Datt Stant, Special Deputy Attorney General
Date: 5/30/14

FOR PLAINTIFF MARY'S HOUSE, INC.

By: S Kyle Woodley
Date: May 30, 2014

FOR PLAINTIFFS JANE DOES 1-8

By: Edward H. Sharp 5/30/14

Juanita Smith Clark
mediator